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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**

**UNITED STATES OF AMERICA**

**3:17-cr-00208-JO**

**v.**

**GOVERNMENT'S  
SENTENCING MEMORANDUM**

**CHRISTIAN JENSEL CHAIDEZ,**

**Defendant.**

**Sentencing Date:  
August 27, 2018 at 10:00 a.m.**

The United States of America, by Billy J. Williams, United States Attorney for the District of Oregon, through Kemp L. Strickland, Assistant United States Attorney, respectfully submits the Government's Sentencing Memorandum for the Court's consideration. The government agrees with the factual findings and advisory guideline calculations as set forth in the final Pre-Sentence Report (PSR).

For the reasons stated below as well as in the pre-sentence report, the government recommends the Court sentence defendant Chaidez to 120 months prison followed by 5 years of supervised release. Further, the government requests the Court order a money judgment for \$7,300 (representing proceeds), and order defendant to pay the applicable \$100 fee assessment.

### **Factual Summary**

This White Tundra Title III investigation involved the wiretaps of seven phones over a six-month period. In June 2017, a twelve-person indictment was filed that included drug trafficking charges. During the investigation, agents seized approximately \$49,000.00, twelve firearms, eleven pounds of methamphetamine, a kilogram of heroin, and small amounts of cocaine and marijuana. The June arrests and asset seizures helped dismantle a Salem, Oregon methamphetamine and cocaine distribution network that was expanding into heroin distribution. The group transported drugs from Los Angeles, California to Salem, Oregon. These arrests have significantly disrupted the distribution of methamphetamine and cocaine in the Salem, Oregon area.

With respect to defendant Chaidez, on November 17 and December 12, 2016, agents used an undercover informant to purchase ½ pound of meth from Chaidez on both occasion. During the conspiracy, agents learned, through wire calls, that co-defendant Valadez was distributing ounce quantities of heroin to Chaidez. They surveilled her on a few occasions and watched as heroin transactions occurred. By listening to wire calls, agents overheard co-defendant Duran arranging for Valadez to meet with Chaidez for the sale of heroin. Later, agents watched as Duran met up with Chaidez to receive his monetary cut from the transactions.

### **Relevant Conduct**

The parties agree that in the date range alleged in the indictment and in the District of Oregon, defendant possessed with the intent to distribute at least 150 but less than 500 grams of actual methamphetamine (the approximate equivalent of 9,060 kilograms of marijuana). The parties further agree that defendant possessed with the intent to distribute at least 49 grams of heroin (the approximate equivalent of 49 kilograms of marijuana). The parties finally agree that the marijuana equivalent for all drugs is approximately 9,109 kilograms and pursuant to U.S.S.G. § 2D1.1, results in a Base Offense Level of 32, prior to adjustments.

### **Acceptance of Responsibility**

Defendant accepted responsibility for his conduct. The government recommends the court grant the three level departure for acceptance of responsibility under USSG § 3E1.1(a),(b).

### **Sentencing Calculations**

Base Offense Level per USSG § 2D1.1:	32
Acceptance of responsibility per to USSG § 3E1.1:	<u>- 3</u>
Total offense level:	29

An adjusted offense level of 29 in Criminal History Category I produces an advisory guideline range of 121 – 151 months custody. The parties stipulate to a 120-month sentence as long as defendant demonstrates an acceptance of responsibility as explained above.

### **Conclusion and Recommendation**

For the reasons set forth above, and consistent with the terms of the plea agreement between the parties, the government recommends that the court impose a 120-month prison sentence in this case. The government further recommends the court impose a five-year period of supervised release, a \$100 fee assessment, and orally pronounce forfeiture on the record in the amount \$7,300. Under the facts in this case, the recommended sentence will promote respect for the law and provide just punishment for this offense. Such a sentence would recognize

defendant's role in this offense and satisfies the requirement of 18 U.S.C. §3553(a) as a  
"sentence sufficient, but not greater than necessary" to meet the purposes of § 3553(a)(2).

Dated: August 22, 2018

Respectfully submitted,

BILLY J. WILLIAMS  
United States Attorney

/s/ Kemp L. Strickland  
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Assistant United States Attorney